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To: <wvogl@samhsa.gov>
Date: 7/8/04 1:50PM
Subject: Public Comment on FR 04-7984 Revised Mandatory Guidelines

Attention Sirs:

As a drug free federal employee who has worked for the U.S. Department of the Interior for 17 years I wanted to express my concern regarding the proposed changes to federal drug testing guidelines. I have recently learned that several significant changes are being proposed for federal drug testing guidelines that would make it difficult for people who suffer from paruresis (more commonly known as "shy bladder syndrome") to provide a urine sample within the time frame and environment mandated in the revised guidelines. I have suffered from paruresis my entire adult life and worry that my job may be in jeopardy if the proposed changes are made to the current federal drug testing guidelines which will make it more difficult to provide a urine sample for illegal drug screening. On several previous occasions I have successfully been tested negative for illegal drug use and see no reason to put more restrictions and constraints on the procedures used to test federal employees.

If changes must be made to these guidelines then please consider implementing other drug screening methods such as hair, saliva, or blood testing.

The changes being proposed for the federal drug testing guidelines will potentially cause a great deal of discrimination against people such as myself who suffer from paruresis. A good example of this is the three hour time restraint being proposed to keep employees at the testing facility before they are determined to suffer from a "shy bladder". This requirement is barbaric. My "shy bladder" condition can be extremely severe at times. I once sat on a train for three days and could not urinate because of my shy bladder condition - this is no joke. Three hours sitting in a test facility is not going to make any difference. It will just cause a great deal of pain waiting for three hours with a full bladder. This can have very detrimental effects on the health and well-being of people who suffer from paruresis. Since the goal of testing federal employees is to detect and prevent the use of illegal drugs and not determine if employees suffer from "shy bladder syndrome",

other less intrusive methods should be made available to all federal employees who are selected for drug screening.

Thanks for allowing me the opportunity to respond to these changes to federal drug testing guidelines. If you have any questions or need additional information about paruresis, please contact me at the e-mail address provided below.

Sincerely,
Gary Fisher
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